

EXHIBIT B

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF MICHIGAN
SOUTHERN DIVISION**

DESHEILA C. HOWLETT,

Plaintiff,

v.

**CIVIL NO. 17-11260
Hon. Terence G. Berg
Mag. R. Steven Whalen**

**CITY OF WARREN; COMMISSIONER
JERE GREEN, acting in his individual
capacity; LT. LAWRENCE GARDNER;
SHAWN JOHNSON; DAWN MCLANE;
ANWAR KHAN; DARRIN LABIN;
WILLIAM ROSS; KEVIN BARNHILL;
PAUL HOUTOS; SCOTT TAYLOR**

Defendants.

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**PLAINTIFF DESHEILA C. HOWLETT'S SUPPLEMENTAL RESPONSES
TO DEFENDANTS' FIRST SET OF INTERROGATORIES AND
REQUESTS FOR PRODUCTION OF DOCUMENTS**

Plaintiff DeSheila C. Howlett ("Plaintiff"), by her attorney, the Mungo Law Firm, PLC, hereby supplements her Responses to Defendants' First Set of Interrogatories and Requests for Production of Documents ("Discovery Requests") pursuant to Fed. Civ. P. 26(e) in the above-captioned matter as follows:

GENERAL OBJECTIONS AND STATEMENTS

The following objections are incorporated into all of Plaintiff's responses below.

1. As Plaintiff prepared responses in accordance with the instructions contained in Fed. R. Civ. P. 26, 33 and 34 as well as the objections particular to this case, Plaintiff objects to the extent that the instructions and definitions given by Defendants enlarge, modify, or extend the requirements in any applicable Federal Rule of Civil Procedure.

2. Plaintiff objects to discovery requests seeking production of or a list of "every" and "all" (or similar words) documents or facts to be "set forth specifically and in detail" (or similar words) regarding a topic for the reasons that such requests are unduly burdensome, overbroad, oppressive, unreasonable, and are not reasonably calculated to lead to admissible evidence.

3. As Plaintiff prepared responses in accordance with Fed. R. Civ. P. 26, 33 and 34 based on the documents and information identified by Plaintiff or existing at the present time, Plaintiff, however, reserves the right to supplement these responses or offer evidence at trial and/or any further proceedings based on documents, knowledge, or information not yet identified or within the possession, custody, or control of Plaintiff

4. Supplemental responses and/or production of documents, are made as provided by Fed. R. Civ. P. 26.

ANSWER:

(1) Valivonis (Aldona) 700 N Old Woodward Ave, Birmingham, MI, 48005; (248) 642-8263, on the following dates:

2017

8/25, 8/28, 9/1, 9/11, 9/15, 9/18, 9/25, 9/29, 10/02, 10/06, 10/09, 10/13, 10/16, 10/30, 11/03, 11/08, 11/10, 11/13, 11/17, 11/20, 11/22, 12/1, 12/4, 12/8, 12/13, 12/18, 12/22

2018

1/8, 1/19, 1/26, 2/2, 2/5, 2/12, 2/16, 2/19, 2/27, 3/9, 3/12, 3/16, 3/19, 3/26, 3/30, 4/2, 4/6, 4/9, 4/20, 4/27, 5/4, 5/18, 5/25, 6/1, 6/15, 6/22, 6/26, 6/29, 7/6, 7/13, 7/20, 7/27, 8/3, 8/10, 8/17, 8/24.

Treated for Psychological Therapy

Amount Paid: \$2,000 (See attached Bates documents 0106 - 0110)

(2) Dr. Garmo (Alberto) 26111 W 14 Mile Rd., #103, Franklin, MI, 48025; (248) 652-7823 on the following dates:

2017

9/13, 10/16, 12/14

Treated for Psychological Therapy

Amount Paid: \$177.06 (See attached Bates documents

INTERROGATORY

11. Please provide the name, address and telephone number of each and every medical and psychological professional, hospital, clinic and practice, and every social worker and counselor who has attended, treated, evaluated or examined you in the previous ten (10) years, providing the date(s) and purposes or condition for which you were attended, treated or examined and the diagnosis and

prognosis of each.

ANSWER:

**Without waiving the General Objections and Statements, Plaintiff
responds as follows:**

- (1) Valivonis (Aldona) 700 N Old Woodward Ave, Birmingham, MI, 48005; (248) 642-8263, on the following dates:**

2017

8/25, 8/28, 9/1, 9/11, 9/15, 9/18, 9/25, 9/29, 10/02, 10/06, 10/09, 10/13, 10/16, 10/30, 11/03, 11/08, 11/10, 11/13, 11/17, 11/20, 11/22, 12/1, 12/4, 12/8, 12/13, 12/18, 12/22

2018

1/8, 1/19, 1/26, 2/2, 2/5, 2/12, 2/16, 2/19, 2/27, 3/9, 3/12, 3/16, 3/19, 3/26, 3/30, 4/2, 4/6, 4/9, 4/20, 4/27, 5/4, 5/18, 5/25, 6/1, 6/15, 6/22, 6/26, 6/29, 7/6, 7/13, 7/20, 7/27, 8/3, 8/10, 8/17, 8/24.

Psychological Therapy

(Diagnosis - anxiety, depression and post-traumatic stress syndrome. See records for complete diagnosis.

Prognosis- not able to return to work of any kind or pursue training for career change until approx. summer of 2020.)

Amount Paid: \$2,000

- (2) Dr. Garmo (Alberto) 26111 W 14 Mile Rd., #103, Franklin, MI, 48025; (248) 652-7823 on the following dates:**

2017

9/13, 10/16, 12/14

Psychological Therapy (Diagnosis - anxiety, depression and post-traumatic stress syndrome)

Amount Paid: \$177.06

- (3) **Dr. Kallabat (Steve) 1109 W. Long Lake Rd., #101, Bloomfield Hills, MI, 48302; (248) 723-2400 on the following dates:**

2018
1/10

Treated for weight loss. (Ran test, diagnosis - Stress)

Amount: \$524.61. Medication Co-pay amount \$57.30

- (4) **E. R. Henry Ford Medical Center, 3500 15 Mile Road, Sterling Heights, MI 48310, Phone: (586)977-930 on the following dates:**

9/11/17

Treated for dizziness and fainting

- (5) **Dr. Lolonya Moore, OBGYN, 326 N Main St., Royal Oak, MI 48067, (248)584-7600 on the following date:**

1/18/18 and 4/23/18

Annual physical and ultrasound (No diagnosis)

Amount Paid:\$40.00

- (6) **Dr. John Tower, PO, 171 South Boulevard E, Ste. 140, Rochester Hills, MI 48307, (248) 853-0803, on the following dates:**

2017
11/14, 11/21, and 12/19

Treated for pain in hands (Diagnosis- cramping; Prognosis-unknown)

Amount Paid: \$40.00

- (7) **Great Expressions Dental Center, Dentist, 11885 12 Mile Road, Warren, MI 48093, (586) 574-9800, on the following dates:**

2017
3/14, 3/16, 9/18

2018
3/19

Amount Paid: \$146.00

(Cleaning and check-up of teeth)

INTERROGATORY

13. Please identify by name, address and telephone number of each person with knowledge or information related to the facts, claims, and damages outlined in your complaint and provide the basis and substance of each person's knowledge and information, including their anticipated testimony, if known.

ANSWER:

- a. **Joseph Raymond DiSano, 2162 Banyon Trail, East Lansing, Michigan 48823 whose anticipated testimony will be in accordance with his deposition testimony.**
- b. **Kathy Miller f/k/a Kathy Barnes, retired officer with the Warren Police Department. The basis and substance of her anticipated testimony will relate to Plaintiff's complaints to her regarding racial discrimination and Ms. Miller's report of said racial discrimination to Plaintiff's supervisor.**
- c. **Lorie Barnwell, One City Square, Suite 200, Warren, MI 48093-2395. The basis and substance of her anticipated testimony will relate to the Mayor's refusal to allow the diversity coordinator to provide diversity training to the City Clerk's Office.**
- d. **Paul Wojno, One City Square, Suite 200, Warren, MI 48093-2395. The basis and substance of his anticipated testimony will relate to the Mayor's refusal to provide diversity training to the City Clerk's Office.**

- ee. **Officer S. Krueger, who may be reached through Defendants' counsel. His anticipated testimony will relate to Defendants' acts of racial and gender discrimination creating a hostile work environment for Plaintiff.**
- ff. **Officer R. Williams, who may be reached through Defendants' counsel. His anticipated testimony will relate to Defendants' acts of racial and gender discrimination creating a hostile work environment for Plaintiff.**
- gg. **Officer R. Debeaussaert, who may be reached through Defendants' counsel. His anticipated testimony will relate to Defendants' acts of racial and gender discrimination creating a hostile work environment for Plaintiff.**
- hh. **Officer Debra Broach, who may be reached through Defendants' counsel. His anticipated testimony will relate to Defendants' acts of racial and gender discrimination creating a hostile work environment for Plaintiff.**

INTERROGATORY

14. Identify every effort you have made to mitigate your damages, indicating with specifically each employer with whom you have made application and whether you have been interviewed or offered any position of employment. If you have been offered o position, please state whether you accepted said position,, what the position is, and what is your rate of pay.

ANSWER:

Without waving the General Objections and Statements, Plaintiff responds that she is medically unable to work and will not be able to do so until possibly the summer of 2020.

59. Produce copies of all records, writings, documents and recordings of every kind and nature which evidence your claims of compensatory and exemplary and punitive damages.

ANSWER

Without waiving objections, please see the attached report of Barry Grant. (Bates 0046-0080) and any and all Plaintiffs Supplements to the Plaintiffs Initial Disclosures and Plaintiffs Supplements to Defendants Discovery Request, including but not limited to dispatch logs, police logs, police dailies and audio recordings of a voice alleged to be Mayor Fouts.

I DECLARE THAT THE INTERROGATORY RESPONSES SET FORTH ABOVE ARE TRUE TO THE BEST OF MY KNOWLEDGE, INFORMATION AND BELIEF.

Plaintiff:

DeSheila C. Howlett

AS TO OBJECTIONS ONLY,
Respectfully submitted,
THE MUNGO LAW FIRM, PLC

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Date: August 31, 2018